

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

PUSH DATA LLC,

Plaintiff,

v.

INTER-CONTINENTAL HOTELS
GROUP, INC.,

Defendant.

Civil Action No. 4:20-cv-785-ALM

DEMAND FOR JURY TRIAL

PLAINTIFF’S MOTION TO EXTEND SERVICE DEADLINE

WHEREAS, Plaintiff Push Data LLC (“Plaintiff”), filed its Complaint (D.I. 1) against Defendant Inter-Continental Hotels Group, Inc. (“Defendant”) on October 9, 2020;

WHEREAS, in light of the circumstances surrounding the COVID-19 pandemic, Plaintiff refrained from formally serving Defendant with the summons and Complaint, but did give Defendant notice of suit by letter with a courtesy copy of the Complaint and associated documents;

WHEREAS, Plaintiff has been attempting to work with Defendant in an effort to resolve the matter and believes this effort may still yield productive results;

WHEREAS, the impact of the COVID-19 pandemic has not yet abated;

WHEREAS, the 90-day deadline, pursuant to Fed. R. Civ. P. Rule 4(m), for service of the Complaint and summons is currently January 7, 2021;

THEREFORE, Plaintiff hereby requests that the deadline pursuant to Fed. R. Civ. P. Rule 4(m) for service of the summons and Complaint be extended by 30 days, to February 8, 2021.

Respectfully submitted,

DATED: January 7, 2021

DEVLIN LAW FIRM LLC

/s/Timothy Devlin

Timothy Devlin
tdevlin@devlinlawfirm.com
1526 Gilpin Ave.
Wilmington, Delaware 19806
Telephone: (302) 449-9010
Facsimile: (302) 353-4251

*Attorneys for Plaintiff
Push Data LLC*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing document has been served on all counsel of record via the Court's ECF system.

/s/ Timothy Devlin

Timothy Devlin